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June 6, 2022

Honorable Mae A. D'Agostino, U.S.D.J.  
United States District Court  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway, Room 218  
Albany, New York 12207

**Re: United States v. Xiaoqing Zheng**  
**Case No.: 1:19-cr-00156 (MAD)**

Dear Judge D'Agostino:

The deadline to file post-trial motions with respect to this matter is now June 13, 2022, having been extended by the court. [CM/ECF document 257] I have a jury trial commencing June 13, 2022 in Albany County Supreme Court in the matter of Quinn v. FASNY, et al., Index No. 905960-19. Over the past month, I have had half of my office out with COVID for almost two weeks, and have been extensively preparing for the Quinn trial. The purpose of this letter is to ask the Court for a further extension of the June 13, 2022 motion filing deadline to June 29, 2022. This extension would allow sufficient time given that Mr. Zheng's sentencing is scheduled for August 2, 2022.

We thank the court for its consideration.

Very truly yours,

LUIBRAND LAW FIRM, PLLC



By: Kevin A. Luibrand, Esq.

KAL:jlmm

cc: Richard Bellis, Esq., AUSA